Remarks

Applicant has amended claims 28 and 30; and cancelled claim 29 and 31. Applicant respectfully submits that no new matter was added by the amendment, as all of the amended matter was either previously illustrated or described in the drawings, written specification and/or claims of the present application. Entry of the amendment and favorable consideration thereof is earnestly requested.

The Examiner has rejected claims 1-4, 6, 7, 9, 12, 15-27 and 32 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 7,031,471 (Stefik et al.). The Examiner has further rejected claims 8, 11, 28-30 and 31 under 35 U.S.C. §103(a) as unpatentable over Stefik et al. in view of U.S. Patent Application Publication No. 2003/0177095 (Zorab et al.).

Claims 1, recites "a mark printed by said printer on each page of the printed digital file, said mark containing data specific to each page of the printed digital file." Claim 15 recites "at least two marks printed by said printer on the at least two pages of the printed digital file, said marks containing data specific to each of the at least two pages of the printed digital file and said at least two marks being different from each other." Claim 21 recites "printing the digital file with a mark on each page of the document, the mark for each page containing data specific to each page of the printed document." Claim 26 recites "printing the digital file and a mark on each page of the digital file, the mark containing data specific to each page of the printed digital file." Claims 27 and 32 recite "a mark printed by said printer on each page of the printed digital file, said mark containing data specific to each page of the printed digital file." Claim 28 recites "said security data further comprises data specific to each page of said digital file and said mark further contains data specific to each page of said digital file." Claim 30 recites "said security data further comprises data specific to each page of said digital file and said Optical Variable Device further contains data specific to each page of said digital file."

The Examiner has submitted that Stefik et al. discloses "said mark containing data specific to each page of the printed digital file (glyph watermarks to carry document identification can be embedded by the publisher) (col. 10., lines 24-31)." (Official Action 6/12/07, p. 2) Applicant respectfully disagrees. For example, Stefik et al. discloses that "Glyph watermarks to carry document identification can be embedded by the publisher; while glyphs carrying data about a print event can be added to the watermark at the time of printing by a printing system. Both document identification and fingerprinting data can be embedded in the same watermark." (Col. 10, lns. 24-31) Stefik et al. discloses providing a mark "that appears on each page" of the document. (Col. 2, lns. 2-3) The information contained in the mark may include "names, locations, and current date and time" of which the computer creates "a bitmap image of glyph boxes of different sizes" and finally, "the grey codes inside the font boxes now embed the data that the publisher want to appear in the watermarks on the document." (Col. 12, lns. 62-65; Col. 13, lns. 9-11). Nowhere, however, does Stefik et al. disclose or teach a "mark containing <u>data specific to each page</u>" of the printed file as recited in claims 1, 15, 21, 26-30 and 32.

Accordingly, because Stefik et al. fails to disclose a "mark containing <u>data specific to each page</u>" of the printed file, Stefik et al. cannot anticipate claims 1, 15, 21, 26-30 and 32. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) ("a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.")

Applicant further submits that it would not be obvious to modify Stefik et al. according to the presently pending claims as Stefik et al. never mentions or hints at providing a "mark containing <u>data specific to each page</u>" of the printed file. Rather, Stefik et al. is directed toward providing "watermark information including information relating

to the rendering [printing] of the digital document" (Col. 19, lns. 24-24 & 61-63; Col. 20, lns. 34-36); where the watermark information may include "names, locations, and current date and time." (Col. 12, lns. 62-65) Nothing in Stefik et al. suggests that it would be advantageous to provide information unique to each page of the document. However, as stated in the pending application, once a document has been printed, increased security is desired such that it is difficult to make unauthorized copies of the document with a positive security mark. (*See*, Pars. 4-5) To address this problem, a security make that is "unique to the particular file and to the particular page of paper, having a unique (unique to that individual page) number or code" is provided such that a any attempt to counterfeit a security mark would have to be individually completed for each and every page of the document making such an attempt very time-consuming and difficult to achieve. (Par. 18) Nowhere does Stefik et al. disclose or suggest nor do any of the prior art teach such a concept. Accordingly, because Stefik et al. fails to teach a "mark containing data specific to each page" of the printed file, Stefik et al. cannot render claims 1, 15, 21, 26-30 and 32 obvious.

It is respectfully submitted that claims 1-28, 30 and 32, all of the claims remaining in the application, are in order for allowance and early notice to that effect is respectfully requested.

Respectfully submitted,

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